

# Office of Nuclear Smuggling Detection and Deterrence

## Property Management Plan

Version 1.3

May 2020

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**Revision History**

Document Revision No.	Effective Date	Description of Changes
1.0	October 2013	Initial publication
1.1	June 2016	Added ECCN list guidance, High Risk Property Review overview and certification, name change from SLD to NSDD, contractor Sensitive Item List reporting, Summary of Inventory Results report required annually from TVI, Export Restriction Notice requirement, use and reporting of Spare Parts, and insurance instructions for GFP and CAP.
1.2	October 2016	Re-assigned use and reporting of Spare Parts from group-level to country-level, revise declaration of SF-1428 Excess Property requirements, revised Data Sanitization guidance, added reporting of Loss, Damage or Destruction of Property (LDD), and added accompanying NSDD Property Management Checklist.
1.3	May 2020	Updated POCs for property. Added property definitions and the Handheld Shipment Request process.

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## 1. Introduction

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This Office of Nuclear Smuggling Detection and Deterrence (NSDD) Property Management Plan (PMP) is to provide clear and concise guidance to NSDD Property Team personnel for the proper management of government-furnished and contractor-acquired property in support of the NSDD program. This includes stewardship of property according to all applicable laws, regulations, and best practices plus any additional measures identified by NSDD for management and control of property that NSDD considers essential to its mission.

## 2. Property Accounting General Overview

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- NSDD shall maintain a system at NSDD's HQ to document the status of NSDD property according to the requirements of U.S. Department of Energy (DOE) Order 580.1A, DOE Property Management Regulations (DOE-PMR), Federal Management Regulations (FMR), Federal Acquisition Regulations (FAR), the Department of Energy's Acquisition Regulations (DEAR), and any additional property management measures identified by NSDD management.
- The system shall consist of annual updates of all NSDD "mission-critical" Sensitive Property, NSDD "pilferable" Sensitive Property, DOE High Risk Property, and DOE Accountable Property in the form of Microsoft Excel inventory spreadsheets.
- NSDD "mission-critical" Sensitive Property is defined in SLD Program Notice No. 39 dated January 29, 2013 as: Radiation Portal Monitors (RPMs), Spectroscopic Portal Monitors (SPMs), Mobile Radiation Detection and Identification Systems (MRDIS), Radiation Detection Straddle Carriers (RDSCs), Radioisotope Identifiers (RIIDs), Mobile Detection Backpacks, He-3 gas tubes, and vehicles (including trailers). NSDD Program Notice No. 55 dated June 30, 2016 further designated all neutron detectors (He-3, Boron-10, etc.) as Sensitive Property. Due to their "pilferable" nature, NSDD has identified additional equipment as Sensitive Property: laptops, digital cameras, mobile phones, utility panels over \$10,000 in value, and uninterruptable power supplies (UPS).
- DOE High Risk Property is defined as: automatic data processing equipment with data storage capability, especially designed or prepared property, export controlled information, export controlled property (ECCNs), hazardous material, nuclear weapon components or weapon-like components, proliferation-sensitive property, radioactive property, special nuclear material, and/or unclassified controlled nuclear information.
- DOE Accountable Property is all property valued at \$10,000 or more, or any property valued less than \$10,000 designated as Sensitive (mission-critical or pilferable) and/or High Risk Property.
- NSDD's HQ shall maintain a Master Equipment List (MEL) spreadsheet of the real-time status of all RPMs in the program. The MEL spreadsheet shall include RPMs that are NSDD property as well as RPMs that have been transferred to host countries or other entities and are no longer NSDD property.

### 3. Meeting Regulatory Requirements

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#### 3.1. Annual Reporting

All NSDD organizations shall submit annual updates on all NSDD property in their custody, including government-furnished equipment and contractor-acquired equipment, but excluding consumables.

- In Microsoft Excel format with password protection.
- Using a format compatible with the MEL template to include the data fields required in DOE Order 580.1A, 4-c-(4) and FAR 52.245-1.
- Step by Step Process:
  - By November 15, all entities submit their password-protected final inventory reports of all NSDD property per country or site for the end of the prior fiscal year ending Sep 30th, excluding consumables to NSDD's Property Specialist.
  - NSDD's HQ retains copies on the NSDD share drive.
  - NSDD's HQ reviews each submission for accuracy and completeness, and follows up with revision requests as needed.
- Pacific Northwest National Laboratory (PNNL) submits their own property management database's inventory report with the addition of the columns and data elements to comply with DOE Order 580.1A, 4-c-(4) and FAR 52.245-1 reporting requirements.
- NSDD's HQ maintains permanent records of all NSDD property based on the annual NSDD inventory reports received from all NSDD organizations.
- Labs are required to report property in their possession provided directly by NSDD's HQ (e.g., TVI), or paid for with direct funding provided by NSDD for NSDD program use in their annual NSDD inventory reports. If the property is owned by another party, labs do not need to report this property in their annual NSDD property report, but the party of ownership should receive annual non-NSDD reports with the property location listed as the lab in possession of their property.
- In compliance with DEAR 945.102-72, NSDD contractors shall draft a list of NSDD property in their inventory considered Sensitive (i.e., "mission-critical" or pilferable). Sensitive Item Lists must be submitted to the Contracting Officer (CO) and Organizational Property Management Officer's (OPMO) Property Administrator (PA) annually by November 15.
- See NSDD PMP's Appendix B – Sensitive Item List.

#### 3.2. PIDS Reporting

- NSDD's HQ shall retain copies of the Property Information Database System (PIDS) reports for DICCE contractors, TVI Logistics (TVI), and other federal contractors on the NSDD share drive.
- Labs shall not send copies of their PIDS reports, as those are lab-wide, unrelated to NSDD.
- Step by Step Process:

- ABQ Complex staff will send a request for PIDS reports to NSDD contractors after the end of the fiscal year.
- NSDD contractors will send copies of their PIDS report to the ABQ Complex and to NSDD's HQ on copy.
  - ABQ Complex will handle the PIDS reports as per their normal process.
  - Contractors must also include a positive or negative non-federal recipient report, or exchange/sale report for any transfers, exchanges or sale of government property that took place during the fiscal year reported.
- TVI shall create and submit a PIDS report to the ABQ Complex.
- TVI shall submit a Summary of Inventory Results report annually to the OPMO's PA for all Sensitive Property and equipment valued over \$10,000. This requirement applies only to TVI.
- See NSDD PMP's Appendix A – Summary of Inventory Results.

### **3.3. Inventories**

- NSDD contractors shall conduct inventories throughout the fiscal year as required in DOE Order 580.1A and FAR 52.245-1 for all NSDD property regardless of value, except consumables. DOE Order 580.1A and FAR 52.245-1 provide equipment dollar value reporting criteria that do not apply to NSDD contractors, as inventory specifications are issued under contract terms.
- NSDD contractors shall also conduct and submit inventories within 30 days of the completion of a group, when a site and the related equipment is descoped from a contract, or whenever equipment is otherwise determined to no longer be required for use under a contract or task order.
- Labs shall conduct inventories throughout the fiscal year as required in DOE Order 580.1A and FAR 52.245-1 for all NSDD property regardless of value, except consumables.
- All inventory designated as Sensitive or High Risk Property shall also be reported as such in the NSDD MEL template's "Sensitive and/or High Risk Personal Property" column.

### **3.4. Export Control**

- Labs shall have the capability to provide export control documentation on equipment shipped overseas under laboratory control as requested.
- All NSDD organizations shall provide the export control classification number (ECCN) in the NSDD MEL template's "ECCN" column, except for Aspect equipment, or property procured in-country from a foreign manufacturer not subject to the U.S. EAR's de minimis rules. Note: U.S. products procured from a foreign distributor remain subject to U.S. regulations.
- NSDD's HQ provides export control classification numbers (ECCN) to NSDD organizations for government-furnished property with an ECCN List tab in the NSDD MEL template.
- See Appendix C – ECCN List.

- DOE's Export Restriction Notice in 41 CFR 109-1.5303(b)(6) applies to all exports, loans, transfers, declarations of Excess Property, and dispositions of property, and shall be included as an accompanying document in such transactions by the transferor.

### **3.5. High Risk Property Reviews**

- All NSDD organizations shall conduct High Risk Property reviews before shipping, transferring, declaring as excess, or disposing of all NSDD property.
- Labs may use their own template or document to certify a High Risk Property review was performed if it is in compliance with DOE Order 580.1A.
- If NSDD's HQ (TVI) is the source of the property, the recipient shall conduct the High Risk Property review, as NSDD's HQ does not have appropriate resources to certify the review.
- Whenever NSDD property is shipped, transferred, declared as excess, or disposed of, a copy of the High Risk Property Review Certification shall be provided to NSDD's HQ and saved on the NSDD share drive.
- NSDD's High Risk Property Review Certification template is entitled "High Risk Personal Property Certification Template."
- PNNL's High Risk Property Review Certification template is entitled "High Risk Personal Property Certification (PNNL)."
- See Appendix D – High Risk Property Overview.
- All High Risk Property shall be reported as such in the NSDD MEL Template's "Sensitive and/or High Risk Personal Property" column.

### **3.6. Contamination Free Certification**

- Certification that an item is clean of contaminating radiation is required if equipment contains or contained a radioactive check source, or was utilized in conditions where radioactive contamination was present, e.g. radiation detection equipment (RDE).
- DOE Order 580.1A and DOE Order 458.1 provide broad guidance on the matter.
- NSDD does not have a template for the Contamination Free Certification.
- See NSDD PMP's Appendix E – Contamination Free Certification sample.

### **3.7. Data Sanitization Certification**

- All equipment containing data storage devices shall be sanitized prior to disposition or transferring out of NSDD in compliance with DOE's information technology security policies and procedures.
- When procuring equipment containing data storage devices, contractors shall also purchase data sanitization software compatible with in-country use where the equipment will be installed or primarily used. See NSDD PMP's Appendix G: NSDD Data Sanitization for a listing of sanitization software.



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- All equipment in working condition containing data storage devices used by the contractor in performance of the contract (i.e., office equipment) shall be sanitized via software prior to declaration as Excess Property or in-country disposition.
  - NSDD country managers and/or contractors are encouraged to work with U.S. Embassy staff to identify in-country educational or non-profit organizations eligible to receive donated sanitized equipment declared as Excess Property and designated by the CO for in-country disposition.
  - Contractors or their subcontractors shall complete, sign and submit the NSDD Data Sanitization Certification prior to disposition or donation. A copy of the data sanitization certification shall be saved on the NSDD share drive.
- All equipment containing data storage devices removed by contractors performing a Technical Refresh or upgrade must be sanitized via software to remove NSDD data prior to returning the equipment to the host country.
  - After data sanitization of old equipment removed under a Technical Refresh, contractors shall not take back old equipment as it has been formally donated to the host country, but they may dispose of the equipment as directed in writing by the host country. Promotion of donating the sanitized equipment for educational use is encouraged if the host country does not want the old equipment back.
  - If the host country requests the return of the old equipment without data sanitization for the purpose of retaining the data, contractors shall notify the NSDD country manager, and comply with the request.
  - Contractors are not required to sign and submit NSDD's Data Sanitization Certification for Technical Refresh data sanitizations, but the contractor is responsible for notifying the NSDD country manager in writing via email or electronically of the date the data sanitization was completed.
  - If the equipment is no longer operational or functioning, it is acceptable to destroy the hard drive/memory chip with a hammer or drill as the data sanitization method on the certification. Contractors shall notify the Contracting Officer's Representative (COR) or CO no later than 14 days prior to any destruction of property.
- Equipment containing data storage devices does not require data sanitization if it is transferred within NSDD, or reutilized specifically for NSDD's use.
- NSDD's data sanitization certification template is entitled "Data Sanitization Certification Form R1.0 (2014-06)".
- See NSDD PMP's Appendix G: NSDD Data Sanitization Certification

### **3.8. Insurance for GFP and CAP**

- As the U.S. Government is self-insured, cargo insurance for government-furnished property (GFP) is not an allowable cost, nor is warehouse insurance. Cargo and/or warehouse insurance for contractor-acquired property (CAP) is an allowable cost.

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### **3.9. Loss, Damage, or Destruction of Government Property and Reporting**

- Loss of government-furnished property or contractor-acquired property includes: items that cannot be found after a reasonable search; theft; damage resulting in unexpected harm to property requiring repair to restore the item to a usable condition; or destruction resulting from incidents that render the item useless for its intended purpose or beyond economical repair. Defective parts from the manufacturer are not considered damaged.
- The COR or CO shall be notified in writing immediately of the loss, damage or destruction (LDD) of Government Property via email or electronic submittal, and the contractor shall await further instruction from the COR or CO.
- NSDD does not have a required template or format for reporting LDD of Government Property, but the contractor's report shall include the following data elements: date of the incident; description of the property; unique identifying number of the property involved; procurement contract number; quantity; unit of measure; acquisition cost; full narrative of the LDD circumstances with location of the property and incident; identification of individuals involved; cause of LDD and actions taken or to be taken to prevent recurrence; and supporting documentation, such as applicable police reports, move tickets, etc.
  - The contractor shall notify the COR or CO immediately of the LDD of Government Property, but the report is due no later than 14 days after the LDD incident via email or electronic submittal.

## **4. NSDD-specific Property Management Practices**

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### **4.1. Property Acquisition**

- Generally, NSDD contractors or TVI directly procure NSDD property under contract funding, and NSDD transfers it to host governments within a year.
  - Contractor property acquisition is governed by the FAR and DEAR, as applicable.
- NSDD's HQ directly procures new RPMs from manufacturers on an as-needed basis.
  - This property is usually stored at TVI until it is shipped out for use.
- Labs (in particular, PNNL) also directly procures property on NSDD's behalf.
  - PNNL procures all handhelds, backpacks, and spare parts for the sustainability program and ships them to host countries for use within a year.
  - Any property procured by any organization for NSDD with NSDD funds shall be reported as NSDD property, and copies of all original shipping documentation shall be retained by the procuring organization for presentation upon request within 48 hours to NSDD's HQ. Original shipping documentation should include, but is not limited to: commercial/proforma invoices; airway bills, ocean or trucker bills of lading; and an import customs release document. Copies of original shipping paperwork must be retained to allow for re-exports or re-transfers, and to comply with U.S. trade regulations.

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- NSDD's HQ becomes aware of newly-acquired NSDD Sensitive Property when it ships for the first time via the shipment process below, or when reported in annual NSDD inventory reports.
- See Section III a. "Annual Reporting" for additional guidance reporting procurements to NSDD.

### **4.2. Custody Transfers of Property within NSDD**

- A custody transfer refers to situations where property changes hands between NSDD organizations and the property is still intended for use by the NSDD program.
- Step by Step Process:
  - Receive approval to transfer the property from NSDD's HQ if the property is NSDD Sensitive.
  - An SF-122 form shall be filled out by the holding and ordering (receiving) organization, signed by both parties, then copy circulated to NSDD's HQ. The ordering (receiving) organization may originate the form.
  - NSDD's HQ will maintain a log of files related to each SF-122 property transfer, and will keep copies of all signed SF-122 forms on the NSDD share drive.
  - Labs and/or contractors shall retain copies of all original shipping documentation for presentation upon request within 48 hours to NSDD's HQ.
  - A High Risk Property Review Certification and MEL are required.
- This property shall be reported on the ordering (receiving) NSDD organization's annual inventory report if it is still being used for the NSDD program, and it still needs to be reported by the prior holding NSDD organization after the SF-122 form has been signed and the physical transfer takes place. Both the holding NSDD organization and ordering (receiving) NSDD organization need to report the property and its location in their annual inventory reports until the property is formally transferred under the appropriate property transfer mechanism, or dispositioned.
- For custody transfers using a DOE loan agreement, both organizations must also report the property on their annual NSDD inventory reports.

#### Custody Transfer Specifics for NSDD Organizations:

- Pacific Northwest National Laboratory (PNNL)
  - Property shall be permanently transferred using an SF-122 form, or DOE F 4420.2 loan agreement form for temporary transfers.
  - All property delivered to TVI's warehouse permanently transferring from PNNL to NSDD shall be reported on an SF-122 form.
  - Property listed on the current NSDD General Equipment List permanently transferring from NSDD to PNNL shall be reported on the SF-122 form if not transferred the under PNNL-specific property transfer process.
- Los Alamos National Laboratory (LANL)

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- Property shall be transferred as government-furnished property.
  - Terms of property transfer are captured on the shipping documents (ExWorks, FOB, etc).
- Oak Ridge National Laboratory (ORNL)
  - Property shall be transferred using an SF-122 form or DOE F 4420.2 loan agreement form for temporary transfer. ORNL must pay a sales tax upon receipt of property in Tennessee and loan agreements shall be used in lieu of an SF-122 form for temporary transfers.
  - Required documents include a list of the items, acquisition cost and date, and a person at ORNL designated as the custodian of the property authorizing the ORNL purchase order.
- Sandia National Laboratories (SNL)
  - Property shall be transferred using an SF-122 form.
- Design, Implementation, Integration, Construction, Communication and Engineering (DICCE) contractors (or other direct federal contractors)
  - When NSDD's HQ transfers custody of property to DICCE contractors or other direct federal contractors, it shall be transferred or added via the GFP contractual mechanism.
  - An SF-122 form may be used to document the transfer if directed by the COR, CO or PA.

### **4.3. Custody Transfers of Property Out of NSDD**

- When property is no longer intended for use by NSDD (specifically, inter-governmental transfers, or disposal via a recycler, etc.) and it is transferred to an organization outside of NSDD, an SF-122 form shall be used to document the transfer of Government property.
- After this property is transferred out of the NSDD program, it no longer needs to be reported on NSDD annual inventory reports.
- If the property is transferred to a non-governmental entity, the transferring organization must report the transaction by filing an annual non-federal recipient report to ABQ Complex.
  - Property transferred via GSAXcess is automatically reported and neither an SF-122 form nor annual non-federal recipient reporting is required.
- Step by Step Process using an SF-122 form:
  - Receive approval to transfer the property from NSDD's HQ if the property is NSDD Sensitive.
  - An SF-122 form shall be filled out by the holding agency, signed by both parties' property administrators, with the final signed copy provided to NSDD's HQ.
  - NSDD's HQ maintains a log of files related to each SF-122 property transfer and keeps copies of all signed SF-122 forms on the NSDD share drive.
  - Labs and/or contractors shall retain copies of all original shipping documentation for presentation upon request within 48 hours to NSDD's HQ.
  - A High Risk Property Review Certification and MEL are required.

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## 4.4. Shipments

- TVI Incoming/Outgoing Shipments
  - Before shipping any equipment to/from TVI, approval must be obtained from NSDD's HQ via the applicable TVI Incoming or Outgoing Shipment Request Form.
    - NSDD country managers shall be copied on all shipment requests.
  - Labs and/or contractors shall retain copies of all original shipping documentation for presentation upon request within 48 hours to NSDD's HQ.
  - A High Risk Property Review Certification and MEL are required.
    - NSDD provides HRCs for GFP TVI Outgoing Shipment Request Forms.
    - MELs are not required for RPM TVI Outgoing Shipment Request Forms.
- NSDD Sensitive Property Shipments
  - Prior to shipping any NSDD "mission-critical" Sensitive Property within the U.S. or across international borders, approval must be obtained from NSDD's HQ via the NSDD Sensitive Property Shipment Form.
    - If origin or destination is TVI, use appropriate TVI form instead.
    - Approval is not needed for RIIDs or handhelds being shipped directly by PNNL or their subcontractors (Desyre or contractors).
    - Approval is not needed for "pilferable" Sensitive Property.
    - NSDD country managers shall be copied on all shipment requests.
  - Labs and/or contractors shall retain copies of all original shipping documentation for presentation upon request within 48 hours to NSDD's HQ.
  - A High Risk Property Review Certification and MEL are also required.
- Shipment requests are reviewed by the NSDD Property Team for:
  - Efficiencies in equipment usage (i.e., Do we need to ship that monitor from TVI, or is there an extra one in a neighboring country we can use instead?).
  - Efficiencies in shipping (i.e., Should the contractor pay for the shipping, or should we use extra money on the TVI contract?).
  - Efficiencies in disposition (i.e., Do we need to ship that equipment back to the U.S., or should we dispose of it in-country?).
  - Retention of original shipping documentation to facilitate import/export.
  - Verification of accompanying High Risk Property Review Certifications.
  - Confirmation of NSDD management intentions.
- See NSDD PMP's Appendix F – Shipping and Custody Reference Chart.

#### **4.5. RPM Management Process**

- NSDD's Inventory Management team maintains a Master Equipment List (MEL) spreadsheet of the real-time status of all RPMs in the program.
- The inventory includes RPMs that are NSDD property as well as RPMs that have been transferred to host countries or other entities and are no longer NSDD property.
- The inventory contains information on each RPM (e.g. serial number, make/model, shipment locations to/from) and is updated per the approved shipment request forms and Functional Compliance Test Reports (FCTRs).

#### **4.6. Use and Reporting of Spare Parts**

- NSDD defines Spare Parts as equipment, except for consumables, procured for the purpose of replacing a failed or defective part during installation, Site Inspection and Testing (SIT), or Final Inspection and Turnover (FIT); or, any equipment stored in inventory not designated for future installation at a pre-determined site (excluding RPMs, handhelds, neutron detectors, lead).
- Contractors shall establish and maintain a separate country-level Spare Parts MEL.
  - Contractors are required to submit an updated "running tally" country-level Spare Parts MEL with General Arrangements (GA) containing the proposed equipment lists for a group, or whenever equipment requirements change under revised Statements of Work (SOW) via email or electronically to the same recipients as the Preliminary Design(s).
- All Spare Parts, except for consumables, paid for or reimbursed with DOE-contracted funds shall be reported, regardless of consignment to host countries for customs and value-added tax (VAT) exemption procedures upon importation, or storage at host country facilities.
- NSDD country managers and/or contractors shall coordinate with host countries to ensure continued access to the Spare Parts pool during the duration of contract performance, to include follow-on contracts, task orders, and/or groups.
- All remaining Spare Parts procured for previously accepted sites shall be used before procuring new spare parts and equipment for future installations.
- If remaining Spare Parts will not be used in future site installations, they shall be reported as "excess" property to the contract with the submittal of an SF-1428 form to the CO immediately upon determination of their excess status, but no later than 30 days. (Of note: In cases where the due date is specified in the SOW that is the date, if not specified, then it is still due within 30 days).
- After the CO's review of the SF-1428 form, the CO may instruct the contractor to include the Spare Parts MEL in the Final Installation Report submitted as a Contract Deliverable. Provide enough advance notice to the CO with the submittal of the SF-1428 form to allow for inclusion of the Spare Parts MEL in the Final Installation Report.

## 4.7. Property Accounting at Contract Closeout

- Overview
  - After completion of contract performance, property may exit NSDD's contracts or custody in several ways:
    - Transfer to the host government
    - Reutilization within NSDD
    - Disposition of excess government property by:
    - Transfer to other government agency, or
    - Disposal via the GSAXcess process, a recycler, or donation to local organizations.
- NSDD-Host Government Property Transfer Process
  - NSDD shall use the authority provided for in DOE Order 580.1A, the Atomic Energy Act, delegation from the NNSA Deputy General Counsel for Procurement, and the NNSA Organizational Property Management Office, and the following process to transfer installed NSDD equipment to a host government.
  - Step by Step Process:
    - Contractor turns in the Final Installation Report with equipment listed in the DOE Order 580.1A-compliant MEL format.
    - NSDD's HQ prepares a property transfer package including equipment lists, export control information, shipping documents, partner transfer letter, Memorandum of Understanding or Agreement, General Counsel Authorization Memo, and draft CO memorandum, then they send the draft package to the appropriate CO.
    - CO requests High Risk Property Review Certification(s) from contractors.
    - Upon receipt of High Risk Property Review Certification(s), the CO signs the transfer package and returns it to NSDD's HQ.
    - Upon receipt of signed transfer package, NSDD's HQ works with the host government to accept the property using the host government's processes.
    - When property has been successfully transferred, an update containing the list of transferred equipment will be sent to NSDD's Inventory Management team for updating the NSDD MEL inventory database with the property's status.
    - Labs often maintain their own lab-specific property transfer processes.
  - SF-1428: Declaration of Excess Property
    - This form shall be used by contractors to report as "excess" all government-furnished and contractor-acquired property that is not required to perform the scope of work immediately under contract.
    - Excess Property shall be reported immediately upon discovery that the property is not required to perform the scope of work immediately under contract to allow for in-country staff adequate

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time to comply with the CO's disposition authorization instructions, but no later than 30 days after determination.

- All Excess Property shall be declared upon the completion of each group (except for Spare Parts), upon the descoping of a site and its equipment from a task order/contract, or when equipment becomes unneeded under the contract for any other reason.
- Spare Parts shall be declared as Excess Property at the time of contract close-out, or demobilization, or when it is determined a Spare Part is defective, obsolete, etc.
- The SF-1428 form shall be submitted to the CO with enough advance notice before demobilization under a contract to allow in-country staff adequate time to comply with the CO's disposition authorization instructions.
- Step by Step Process:
  - When contractors have unneeded property, they shall report it immediately to the CO with NSDD's HQ on copy upon recognition that it is Excess Property using an SF-1428 form, but no later than 30 days after determination.
  - The SF-1428 form must be accompanied by supporting documents to include a MEL, High Risk Property Review Certification, and DOE's Export Restriction Notice. Contractors shall create a unique SF-1428 Schedule Reference Number.
    - Contractors shall entitle the MEL with the SF-1428 Schedule Reference Number.
    - In lieu of completing Field Nos. 13 through 23 on the SF-1428 form, the title of the MEL shall be referenced once instead.
  - The COR and NSDD's HQ shall review the equipment declared as Excess Property, offering a disposition recommendation to the CO for each item.
    - Disposition options include: reutilization on another contract; reutilization with another NSDD organization, such as a lab or regional maintenance contractor; shipment back to TVI for storage; donation; auction; disposal; or other methods deemed appropriate by the CO.
  - The CO shall issue Disposition Authorization and instructions to the contractor for property disposition.
  - NSDD's HQ will maintain a log of files related to each SF-1428 form submittal, including the proof of disposition paperwork provided by the contractor after disposition, and will keep copies of all SF-1428 forms on the NSDD share drive.
  - After the contractor submits disposition paperwork as proof of compliance with the CO's disposition instructions, the property will be removed from their contract and returned to the government's custody, for accounting and liability purposes. The submittal of the SF-1428 package notifies the CO of the Excess Property and compliance with the CO's disposition instructions removes the property from the contract.

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#### **4.8. Excess Property as the First Source of Supply**

- The FAR and other property management regulations mandate the use of Excess Property as the first source of supply before procuring new equipment for Cost-reimbursement contracts.
- Sources of NSDD Excess Property include, but are not limited to:
  - In-country inventory of functioning Spare Parts remaining after SIT or FIT, or de-scope.
  - Intra-EU transfers of Spare Parts between task orders or contracts, if transferable.
  - Intra-regional transfers of Spare Parts between task orders or contracts, if transferable.
  - Current inventory at the “TVI Store” at NSDD’s warehousing contractor’s facility in Warren, MI.Available equipment can be reviewed in an Excel inventory report.
- To claim inventory from the “TVI Store,” an NSDD TVI Outgoing Shipment Request, MEL and High Risk Property Review Certification is required.

#### **4.9. Property Disposition**

- General Property Disposition Process
  - The NSDD Property Team shall advocate for the reutilization of any Excess Property within the NSDD program, including contractors and labs, before the initiation of any new comparable equipment procurements.
  - The NSDD Property Team shall share available items amongst NSDD organizations via email with a Reutilization Check requesting claim(s) for the Excess Property.
  - If no claims are made, the NSDD Property Team shall still make the equipment available to NSDD organizations for non-NSDD uses, and within NNSA and DOE utilizing the automated Energy Assets Disposal System (EADS).
  - If no claims are made, the NSDD Property Team shall utilize the automated GSAXcess Federal Surplus property system administered by the General Services Administration to make the items available to other federal agencies, limited non-profit and educational organizations, and public bidder sales auctions.
  - Items that are not claimed or sold after posting to GSAXcess will be returned to NSDD with automatic approval for disposal through environmentally sound methods, including recycling, etc.
  - Scrap equipment or consumables do not require federal screening prior to disposal.
  - Foreign Excess Property does not require federal screening via GSAXcess prior to disposition, but donation to other in-country U.S. federal agencies, limited non-profit and educational organizations, and public bidder sales auctions is encouraged.
- NSDD Sensitive and High Risk Property Disposition
  - Any NSDD organization that disposes of NSDD Sensitive and/or High Risk Property shall obtain written authorization from NSDD’s HQ prior to disposition.
- Data Sanitization

- All equipment containing data storage devices must be data sanitized prior to disposition or transfer to any organization outside of NSDD in compliance with DOE's information technology security policies and procedures. If the property is to be transferred or loaned within NSDD, no sanitization is necessary.

## 5. NSDD's Handhelds

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### Overview:

- The new Handheld Equipment Shipment Request Process was implemented in FY 2020.
- The NSDD Handheld Shipment Request form is required to initiate the request and shipping of handheld equipment from the Equipment Logistics Center (ELC) at PNNL.
- The Handheld Procurement Bulk Buy is used to create a Monthly Handheld Inventory Report for Country Managers (CM) to use for an overview of their handheld equipment reservations for the FY.

### Process:

- The handheld shipment request should be initiated by the CM.
- The CM initiates the conversation with their Sustainability Manager (SM).
- The SM and ELC Manager work together to fill out the NSDD Handheld Shipment Request form.
- The SM must obtain an authorized NSDD Federal employee signature in order for the request to be submitted (in most cases this will be the CM).
- The CM/SM should submit the form to the NSDD Shipping Request inbox at [nsdd.shippingrequests@nnsa.doe.gov](mailto:nsdd.shippingrequests@nnsa.doe.gov).
- For approval, the request must include (cc) the following individuals:
  - Implementation Manager
  - Sustainability Manager
  - Country Manager/NSDD Federal Employee
  - Program Controls Analyst
  - ELC Manager ([NSDDequipmentShipment@pnnl.gov](mailto:NSDDequipmentShipment@pnnl.gov))
- The Program Controls Analyst will review the request and make recommendations based on the Handheld Bulk Buy inventory.
- If HQ management approves the request, the shipment request form will be signed and the shipment will be authorized.
- The Program Controls Analyst will email the approved shipment request form and notify all parties of approval.
- The ELC Manager will notify the Program Controls Analyst when the shipment has occurred through the PNNL Monthly Handheld Inventory Report.

## 6. NSDD's HQ Reporting Tools

- Inventory reports.
- Success Stories Log.
- Ability to track number of items and square feet reduced.
- Ability to track costs saved by spotting usage, shipment, or disposal efficiencies.

## 7. NSDD Property Management Plan Checklist

A checklist to promote contractor compliance with NSDD's Property Management Plan is included in the Appendices as Appendix H – NSDD Property Management Plan Checklist as a PDF form. A fillable Word form is also provided by NSDD as a baselined document entitled "NSDD Property Management Plan Checklist R2.0."

### NSDD Property Management Plan Checklist 2.0

	<b>NSDD Annual Reporting</b>
<input type="radio"/>	All unaccepted GFP and CAP property accounted for on a country or site basis, as of Sept 30
<input type="radio"/>	All property reported, excluding consumables, including property consigned to host country
<input type="radio"/>	Annual inventory report submitted in MEL template format with all data fields completed
<input type="radio"/>	Annual inventory report password-protected
<input type="radio"/>	Single-page Sensitive Items List submitted
	<b>PIDS Reporting</b>
<input type="radio"/>	All property valued over \$10k and Sensitive Property reported
<input type="radio"/>	Negative report of PIDS exchange/sale report and non-federal recipients report submitted
	<b>Inventories</b>
<input type="radio"/>	All property reported regardless of value, excluding consumables
<input type="radio"/>	All property reported, including property consigned to or stored by host country at importation
<input type="radio"/>	Inventory in MEL template format submitted within 30 days of completion of a group. descoping of equipment from the contract/task order, or when determined excess (excl. Spares)
	<b>Export Control</b>
<input type="radio"/>	Export control and ECCN information received from supplier at time of procurement
<input type="radio"/>	Export control and ECCN information for U.S. products procured in-country reported
<input type="radio"/>	Export control and ECCN information for GFP provided in MEL template "ECCN Tab"
<input type="radio"/>	DOE's Export Restriction Notice provided with property transfers, SF-1428s, dispositions
	<b>High-Risk Property Review/ Certifications</b>
<input type="radio"/>	High Risk Property Review Certification provided with shipping requests, SF-122s, SF-1428s

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<input type="radio"/>	High Risk Property Review Certification for GFP provided by NSDD Property Team
	<b>Data Sanitization Certification</b>
<input type="radio"/>	Data sanitization software compatible with in-country use of equipment purchased (see App G)
<input type="radio"/>	All equipment in working condition containing data storage devices sanitized via software with declaration as Excess Property or prior to in-country disposition
<input type="radio"/>	Data Sanitization Certification submitted to NSDD (not required for Technical Refresh)
<input type="radio"/>	All equipment in working condition containing data storage devices sanitized via software prior to return to host country after Technical Refresh, or their donation to school, etc.
<input type="radio"/>	NSDD country manager notified in writing of date of data sanitization completion for equipment removed under Technical Refresh (no Data Sanitization Certification required)
<input type="radio"/>	COR or CO notified 14 days in advance of destruction of non-working equipment containing data storage devices with the hammer and drill sanitization method
	<b>Insurance for GFP and CAP</b>
<input type="radio"/>	Freight forwarder cargo/whse insurance billing calculations verified to exclude GFP value
	<b>Loss, Damage or Destruction (LDD) of Government Property and Reporting</b>
<input type="radio"/>	Reporting of LDD for both GFP and CAP is required
<input type="radio"/>	COR or CO notified immediately in writing of LDD incident
<input type="radio"/>	LDD Report submitted within 14 days of LDD incident
	<b>Property Acquisition</b>
<input type="radio"/>	Sensitive Property Shipment Request form submitted before procuring Sensitive Property
<input type="radio"/>	If PNNL or Desyre are coordinating the shipping, Sensitive Property Shipment Request forms are not required for handhelds
	<b>Custody Transfer of Property within/outside of NSDD</b>
<input type="radio"/>	CO may request an SF-122 form, MEL and High Risk Property Review Certification
<input type="radio"/>	TVI Outgoing Shipment or Sensitive Property Shipment Request form may be required
<input type="radio"/>	Copy of original shipping documentation must be submitted to NSDD Property Team or CO
	<b>Shipments</b>
<input type="radio"/>	NSDD country managers must be copied on all shipment requests
	<b>Use and Reporting of Spare Parts</b>
<input type="radio"/>	Contractors shall establish and maintain a separate country-level Spare Parts MEL
<input type="radio"/>	Updated Spare Parts MEL submitted with General Arrangements (GA) or SOW revision
<input type="radio"/>	All remaining Spare Parts procured for previously accepted sites used before procuring new spare parts
<input type="radio"/>	Report as "excess" property with the submittal of an SF-1428 form to the CO of any remaining Spare Parts that will not be used in future site installations

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<input type="radio"/>	Include the Spare Parts MEL in the Final Installation Report submitted as a Contract <i>Deliverable</i> if instructed by the CO after submittal of the SF-1428 form. ( <b>Of note:</b> In cases where the due date is specified in the SOW, that is the date, if not specified, then it is still due within 30 days).
	<b>SF-1428: Declaration of Excess Property</b>
<input type="radio"/>	Excess Property declared immediately upon discovery that the property is not required to perform the scope of work immediately under contract
<input type="radio"/>	Excess Property declared upon the completion of each group (except for Spare Parts), upon the descoping of a site and its equipment from a contract, or when equipment becomes unneeded under the contract for any other reason
<input type="radio"/>	Spare Parts declared as Excess Property at the time of task order or contract close-out, or demobilization, or when it is determined a Spare Part is defective, obsolete, etc.
<input type="radio"/>	MEL used in lieu of completing Field Nos. 13 through 23 on the SF-1428 form
<input type="radio"/>	High Risk Property Review Certification and DOE's Export Restriction Notice submitted
<input type="radio"/>	Proof of compliance with CO Disposition Authorization instructions paperwork submitted
	<b>Handhelds</b>
<input type="radio"/>	NSDD Handheld Shipment Request form must be signed by a Federal Employee
<input type="radio"/>	Request must include the following: Implementation Manager, Sustainability Manager, Federal Employee, Program Controls Analyst, and the ELC Manager
<input type="radio"/>	If request does not align with the Handheld Procurement Bulk Buy reservations, an explanation of discrepancy needs to be provided.

## Appendices

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- A. Summary of Inventory Results
- B. Sensitive Item List Sample
- C. ECCN List
- D. High Risk Property Overview
- E. Contamination Free Certification
- F. Shipping and Custody Reference Chart
- G. Data Sanitization Certification
- H. NSDD Property Management Plan Checklist
- I. Understanding Property - Definition of Terms

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## **Understanding Property Definition of Terms**

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Accountable Property – All property valued at \$10,000 or more, or any property valued less than \$10,000 designated as Sensitive (mission-critical or pilferable) and/or High Risk Property.

Acquisition – An asset or item bought.

CAP – Contractor Acquired Property - Contractor-Acquired Property (CAP) - is property purchased or fabricated by a contractor for use on a contract to which the Government has title. - Provide – means to furnish property (GFP) or to acquire property (CAP).

Closeout – Occurs when a contract has met all the terms of a contract and all administrative actions have been completed, all disputes settled, and all final payments have been made.

CM – Country Managers

CO – Contracting Officer

Contractor – Company that undertakes a contract to provide materials or labor to perform a service or do a job.

COR – Contracting Office Representative

Custody – In possession or responsibility of asset.

Data Sanitization Certification – Effectively erase previously stored data, to overwrite hard disk drive storage.

DEAR – The Department of Energy's Acquisition Regulations

DICCE – Design, Integration, Construction, Communication, and Engineering

DIR – Direct Inventory Report

Disposal – The action or process of throwing away or getting rid of something that is no longer needed.

Disposition – Any sale, transfer, or swap of, grant of interest in or loss or destruction.

DOE – Department of Energy

EADS – Energy Assets

ECCN- Export Control Classification Number

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ELC – Equipment Logistics Center

Excess – Surplus property means excess, real or personal property that is not required for the needs of and the discharge of responsibilities of all federal agencies that has been declared surplus by the GSA.

FAR – Federal Acquisition Regulations

FIR – Final Installation Report

FMR – Federal Management Regulations

GEL – General Equipment List

General Counsel – A chief legal officer, senior management, and board of the legal department to appropriately be aware and advise.

GFP – Government Furnished Property – Property in the possession of or acquired by the Government and subsequently furnished to the Contractor for performance of a contract. It includes items like spares and property furnished for repair, maintenance, overhaul, or modification. It can be items taken or requisitioned from Government inventory or purchased by the Government specifically to be provided on a contract. GFP also includes contractor-acquired property if the contractor acquired property is a deliverable under a cost contract that has been accepted by the Government for continued use under that contract or a future contract.

GSA – General Services Administration

High Risk - Automatic data processing equipment with data storage capability, especially designed for prepared property, export controlled information, export controlled property (ECCNs), hazardous material, nuclear weapon components or weapon-like components, proliferation-sensitive property, radioactive property, special nuclear material, and/or unclassified controlled nuclear information.

HRC / HRPP – High Risk Certification or High Risk Personal Property

HQ – Headquarters

Inventory – A complete list of property and assets in custody.

LDD – Loss, Damaged or Destruction

MSR – Monthly Shipping Reports

NSDD – Nuclear Smuggling Detection and Deterrence

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OPMO – Organizational Property Management Officer

OSR – Outgoing Shipping Request

PIDS – Property Information Database System

PNNL – Pacific Northwestern National Laboratory

RPM – Radio Portable Monitors

Property Transfer Package – A set of documents that is compiled to begin the process of transferring property.

PS – Property Specialist

Sensitive Items – Property is defined in SLD Program Notice No. 39 dated January 29, 2013 as: Radiation Portal Monitors (RPMs), Spectroscopic Portal Monitors (SPMs), Mobile Radiation Detection and Identification Systems (MRDIS), Radiation Detection Straddle Carriers (RDSCs), Radioisotope Identifiers (RIIDs), Mobile Detection Backpacks, He-3 gas tubes, and vehicles (including trailers). NSDD Program Notice No. 55 dated June 30, 2016 further designated all neutron detectors (He-3, Boron-10, etc.) as Sensitive Property. Due to their “pilferable” nature, NSDD has identified additional equipment as Sensitive Property: laptops, digital cameras, mobile phones, utility panels over \$10,000 in value, and uninterruptable power supplies (UPS).

SF-122 – Custody transfer of NSDD property

SF-1428 – Inventory Disposal Schedule

Shipping Requests – Required documents submitted to NSDD property management channels for process and approval of shipment.

SLD – Second Line of Defense

Spare Parts – NSDD defines Spare Parts as equipment, except for consumables, procured for the purpose of replacing a failed or defective part during installation, Site Inspection and Testing (SIT), or Final Inspection and Turnover (FIT); or, any equipment stored in inventory not designated for future installation at a pre-determined site (excluding RPMs, handhelds, neutron detectors, and lead).

Transfer – Occurs when ownership of property is exchanged.

TVI – Technology Ventures Incorporated

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